IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In Re Application of:	)
	) Confirmation No: 8146
Travis J. Parry, *et al.*	)
	) Group Art Unit: 2141
Serial No.: 09/954,832	)
	) Examiner: Shingles, Kristie D
Filed: September 12, 2001	)
	) Atty. Docket No.: 10013769-1
For: System and Method for Facilitating	)
Generation of Hard Copies	)

AMENDED APPEAL BRIEF UNDER 37 C.F.R. § 41.37

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Commissioner for Patents
P.O. Box 1450
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Sir:

This Amended Appeal Brief under 37 C.F.R. § 41.37 is submitted in response to the Notice of Non-Compliant Appeal Brief of March 4, 2008 and in support of the Notice of Appeal filed October 16, 2007, responding to the final Office Action mailed July 17, 2007.

It is not believed that extensions of time or fees are required to consider this Amended Appeal Brief. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. §1.136(a), and any fees required therefor are hereby authorized to be charged to Deposit Account No. 08-2025.

I. Real Party in Interest

The real party in interest is Hewlett-Packard Development Company, LP, a limited partnership established under the laws of the State of Texas and having a principal place of business at 20555 S.H. 249 Houston, TX 77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware Corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holdings, LLC.

II. Related Appeals and Interferences

There are no known related appeals or interferences that will affect or be affected by a decision in this Appeal.

III. Status of Claims

Claims 1-32 stand finally rejected. No claims have been allowed. The rejections of claims 1-32 are appealed.

IV. Status of Amendments

This application was originally filed on September 12, 2001, with twenty-five (25) claims. In a Response filed March 3, 2005, Applicants amended claims 1-7, 11-17, and 21-23 and added claims 26-32. In a Response filed September 15, 2005, Applicants amended claims 1, 3, 8, 11, 18, 21, and 24. In a Response filed February 3, 2006, Applicants amended claims 1, 8, 11, 18, 21, 24, and 29.

In a Response filed May 4, 2006, Applicants provided a response to a notice of non-compliance which clarified the amendments made in the previous response. In a Response filed October 24, 2006, Applicants presented remarks without any claim amendments. The claims in the attached Claims Appendix (see below) reflect the present state of Applicants' claims.

V. Summary of Claimed Subject Matter

The claimed inventions are summarized below with reference numerals and references to the written description ("specification") and drawings. The subject matter described in the following appears in the original disclosure at least where indicated, and may further appear in other places within the original disclosure.

Embodiments according to independent claim 1 describe a method for facilitating generation of a hard copy. The method comprises selecting a document file written in a first language and selecting a translator file configured to translate the document file into a second language of specialized commands for a hard copy generation device (Figure 1, 102). Applicants' specification, page 12, lines 17-21 and page 13, lines 1-2. The specialized commands enable a hard copy of the document file to be produced at the hard copy generation device (Figure 1, 102). Applicants' specification, page 1, lines 18-20 and pages 11-12, lines 22-1. The method further comprises packaging the document file and the translator file together in a job package that can be received by the hard copy

generation device (Figure 1, 102). Applicants' specification, page 10, lines 6-11 and page 12, lines 11-15.

Embodiments according to independent claim 8 describe a system for facilitating generation of a hard copy. The system comprises means for selecting (*e.g.*, Applicant's specification, page 12, lines 21-23) a document file written in a first language. Applicants' specification, page 12, lines 17-21. The system further comprises means for selecting a translator file (*e.g.*, Applicant's specification, page 13, lines 1-8) configured to translate the document file into a second language of specialized commands for a hard copy generation device (Figure 1, 102). Applicants' specification, page 13, lines 1-2. The specialized commands enable a hard copy of the document file to be produced at the hard copy generation device (Figure 1, 102). Applicants' specification, page 1, lines 18-20 and pages 11-12, lines 22-1. Such a system further comprises means for packaging (*e.g.*, Figure 3, 318) the document file and the translator file together in a job package that can be received by the hard copy generation device (Figure 1, 102). Applicants' specification, page 10, lines 6-11 and page 12, lines 11-15.

Embodiments according to independent claim 11 describe a method for generating a hard copy. The method comprises receiving a job package comprising a document file representing a document and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device. Applicants' specification, pages 11-12, lines 22-1 and page 15, lines 1-2. The document file is written in a first language. The method further

comprises opening the job package and using the translator file to translate the document file into the second language. Applicants' specification, pages 11-12, lines 22-1 and page 17, lines 5-10. Such a method also comprises generating the hard copy of the document. Applicants' specification, pages 11-12, lines 22-1.

Embodiments according to independent claim 18 describe a system for generating a hard copy. The system comprises means for receiving a job package (Figure 2, 212) comprising a document file representative of a document and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device (Figure 1, 102). Applicants' specification, pages 11-12, lines 22-1 and page 15, lines 1-2. The document file is written in a first language. The system further comprises means for opening the job package (Figure 2, 200, 220) and means for using the translator file to translate the document file into the second language (Figure 2, 200, 220). Applicants' specification, pages 11-12, lines 22-1; pages 13-14, lines 23-2; and page 17, lines 5-10. Such a system also comprises means for generating the hard copy of the document (Figure 2, 200, 216). Applicants' specification, pages 11-12, lines 22-1.

Embodiments according to independent claim 21 describe a method for generating a hard copy. The method comprises receiving an address that identifies the location of a job package that comprises a document file representative of a document and a translator file configured to translate the

document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device. Applicants' specification, pages 11-12, lines 22-1; page 15, lines 1-2; and page 16, lines 14-17. The document file is written in a first language. The method further comprises retrieving the job package and opening the package. Applicants' specification, page 13, lines 21-24. Such a method also comprises using the translator file to translate the document file into the second language and generating the hard copy of the document. Applicants' specification, pages 11-12, lines 22-1 and page 17, lines 5-10.

Embodiments according to independent claim 24 describe a system for generating a hard copy. The system comprises means for receiving an address (Figure 2, 212) that identifies the location of a job package that comprises a document file written in a first language and a translator file configured to translate the document file into a second language. Applicants' specification, pages 11-12, lines 22-1 and page 15, lines 1-2. The system further comprises means for retrieving the job package (Figure 2, 212) and means for opening the package (Figure 2, 200, 220). Applicants' specification, pages 11-12, lines 22-1; pages 13-14, lines 23-2; and page 17, lines 5-10. Such a system also comprises means for using the translator file (Figure 2, 200, 220) to translate the document file into the second language of specialized commands for producing a hard copy of the document file at a hard copy generation device (Figure 1, 102) and means for generating (Figure 2, 200, 216) the hard copy of the document. Applicants'

specification, page 10, lines 6-11; pages 11-12, lines 22-1; page 12, lines 11-15; and page 17, lines 5-10.

VI. Grounds of Rejection to be Reviewed on Appeal

The following grounds of rejections are to be reviewed on appeal:

Claims 1-4, 8, 11, 18, 21, and 24 have been rejected under 35 U.S.C. § 102(e) as being anticipated by _Cronch_ (U.S. Patent No. 6,954,278).

Claims 5, 16, 17, 22, 25-27, and 29 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over _Cronch_ in view of _Vidyanand_ (U.S. Patent No. 6,967,728).

Claims 6, 7, 9, 10, 12-15, 19, 20, 23, 28, 30, and 32 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over _Cronch_ in view of _Vidyanand_ in further view of _Adamske_ (U.S. Patent No. 6,615,234).

Claim 31 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over _Cronch_ in view of _Vidyanand_ in further view of _Nakamura_ (U.S. Patent No. 6,064,836).

VII. Arguments

A.   Applicants' Claims 1-7 and 26-30

Applicants' independent claim 1 provides as follows:

> A method for facilitating generation of a hard copy, comprising:
>   selecting a document file written in a first language;

> *selecting a translator file configured to translate the document file into a second language of specialized commands of specialized commands for a hard copy generation device, the specialized commands enabling a hard copy of the document file to be produced at the hard copy generation device;* and
>
> *packaging the document file and the translator file together in a job package that can be received by the hard copy generation device.*

(Emphasis added).

Cronch describes a method of downloading an operating system to a printer if the printer operating system does not correspond to data format of a print job to be printed at the printer. *See* abstract. As such, *Cronch* does not teach or suggest translation of a document file (that is to be produced as a hard copy) into a second language used by a hard copy generation device. Rather, *Cronch* seemingly teaches that an operating system is downloaded to a printer that understands the native language of the document file. Therefore, translation would not seemingly be needed in *Cronch.*

Further, for sake of argument if the operating system in *Cronch* is construed as a translator file, *Cronch* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the operating system in a job package that is received by the printer.

For at least these reasons, *Cronch* does not teach or suggest "selecting a translator file configured to translate the document file into a second language of specialized commands of specialized commands for a hard copy generation device, the specialized commands enabling a hard copy of the document file to be produced at the hard copy generation device; and packaging the document

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file and the translator file together in a job package that can be received by the hard copy generation device," as recited in claim 1.

As a result, *Cronch* does not teach or suggest at least all of the claimed features of claim 1. Therefore, claim 1 is not anticipated by *Cronch*, and the rejection should be overturned.

In the final Office Action mailed July 17, 2007, the Examiner in response to Applicants' Arguments from the previous response states "[f]rom *Cronch's* teaching it is evident that to transmit a new or replacement operating system implies that the applications supported by the printer's original operating system are replaced by a new operating system in order to support the particular print job. Thus the functionality of the claim language is achieved by prior art's teachings." Page 2. In response, Applicants disagree and submit that the foregoing statements still do not show that *Cronch* discloses the packaging of a document file and a translator file together in a job package that can be received by the hard copy generation device," as described in claim 1. For at least this reason, *Cronch* does not anticipate claim 1 and the rejection should be overturned.

Dependent claims 2-4 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that dependent claims 2-4 contain all the features of allowable independent claim 1. For at least this reason, the rejections of claims 2-4 should be overturned.

Since claims 5-7 and 26-30 depend from claim 1 and recite additional features, claims 5-7 and 26-30 are allowable as a matter of law over the cited art of record. Further, *Vidyanand* and *Adamske* are legally inadequate to remedy the deficiencies of the *Cronch* reference with respect to claim 1 and claims 5-7 and 26-30.

In particular, *Vidyanand* describes a method for transmitting printer driver preferences across a network. In *Vidyanand*, printer preferences for use at a first printer may be transferred between client computers so that the printer preferences may be used with a second printer, where the printer preferences are modified, as needed, based on the feature set of the second printer. *See* cols. 8-9, lines 59-2. To transfer a set of printer preferences, a user can select to export the set, import a set, *etc.*, as shown by Fig. 10. As such, *Vidyanand* does not remedy the deficiencies of the *Cronch* reference with regard to independent claim 1.

For example, *Vidyanand* does not teach or suggest packaging a document file (that is to be produced as a hard copy) with a translator file in a job package that is received by the printer. For sake of argument if the printer preferences set in *Vidyanand* is construed as a translator file, *Vidyanand* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the printer preferences set in a job package that is received by the printer.

In view of the foregoing, Applicants respectfully assert that *Cronch* in view of *Vidyanand* does not teach or suggest the features of claims 5, 26-27, and 29 which depend from independent claim 1.

Further, the proposed combination of *Cronch* in view of *Vidyanand* in further view of *Adamske* fails to teach or suggest the features of claims 6, 7, 8, 9, and 30 which depend from independent claim 1.

Therefore, the rejections of claims 5-7 and 26-30 should also be overturned.

B.   Applicants' Claims 8-10

As provided in independent claim 8, Applicants claim:

> A system for facilitating generation of a hard copy, comprising:
> means for selecting a document file written in a first language;
> ***means for selecting a translator file configured to translate the document file into a second language of specialized commands for a hard copy generation device, the specialized commands enabling a hard copy of the document file to be produced at the hard copy generation device; and***
> ***means for packaging the document file and the translator file together in a job package that can be received by the hard copy generation device.***

(Emphasis added).

Cronch describes a method of downloading an operating system to a printer if the printer operating system does not correspond to data format of a print job to be printed at the printer. *See* abstract. As such, *Cronch* does not teach or suggest translation of a document file (that is to be produced as a hard copy) into a second language used by a hard copy generation device. Rather, *Cronch* seemingly teaches that an operating system is downloaded to a printer that understands the native language of the document file. Therefore, translation would not seemingly be needed in *Cronch*.

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Further, for sake of argument if the operating system in *Cronch* is construed as a translator file, *Cronch* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the operating system in a job package that is received by the printer.

For at least these reasons, *Cronch* does not teach or suggest "means for selecting a translator file configured to translate the document file into a second language of specialized commands for a hard copy generation device, the specialized commands enabling a hard copy of the document file to be produced at the hard copy generation device; and means for packaging the document file and the translator file together in a job package that can be received by the hard copy generation device," as recited in claim 8.

As a result, *Cronch* does not teach or suggest at least all of the claimed features of claim 8. Therefore, claim 8 is not anticipated by *Cronch*, and the rejection should be overturned.

Since claims 9-10 depend from claim 8 and recite additional features, claims 9-10 are allowable as a matter of law over the cited art of record. Further, *Vidyanand* and *Adamske* are legally inadequate to remedy the deficiencies of the *Cronch* reference with respect to claim 8 and claims 9-10.

In particular, *Vidyanand* describes a method for transmitting printer driver preferences across a network. In *Vidyanand*, printer preferences for use at a first printer may be transferred between client computers so that the printer preferences may be used with a second printer, where the printer preferences are modified, as needed, based on the feature set of the second printer. *See* cols. 8-9, lines 59-2.

To transfer a set of printer preferences, a user can select to export the set, import a set, *etc.*, as shown by Fig. 10. As such, *Vidyanand* does not remedy the deficiencies of the *Cronch* reference with regard to independent claim 8.

For example, *Vidyanand* does not teach or suggest packaging a document file (that is to be produced as a hard copy) with a translator file in a job package that is received by the printer. For sake of argument if the printer preferences set in *Vidyanand* is construed as a translator file, *Vidyanand* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the printer preferences set in a job package that is received by the printer.

Further, the proposed combination of *Cronch* in view of *Vidyanand* in further view of *Adamske* fails to teach or suggest the features of claims 9-10 which depend from independent claim 8.

Therefore, the rejections of claims 9-10 should also be overturned.

C.   Applicants' Claims 11-17 and 31

As provided in independent claim 11, Applicants claim:

> A method for generating a hard copy, comprising:
> **receiving a job package comprising a document file representing a document, the document file written in a first language, and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device;**
> **opening the job package;**
> **using the translator file to translate the document file into the second language; and**
> **generating the hard copy of the document**.

(Emphasis added).

Cronch describes a method of downloading an operating system to a printer if the printer operating system does not correspond to data format of a print job to be printed at the printer. *See* abstract. As such, *Cronch* does not teach or suggest translation of a document file (that is to be produced as a hard copy) into a second language used by a hard copy generation device. Rather, *Cronch* seemingly teaches that an operating system is downloaded to a printer that understands the native language of the document file. Therefore, translation would not seemingly be needed in *Cronch*.

Further, for sake of argument if the operating system in *Cronch* is construed as a translator file, *Cronch* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the operating system in a job package that is received by the printer.

For at least these reasons, *Cronch* does not teach or suggest "receiving a job package comprising a document file representing a document, the document file written in a first language, and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device; opening the job package; using the translator file to translate the document file into the second language; and generating the hard copy of the document," as recited in claim 11.

As a result, *Cronch* does not teach or suggest at least all of the claimed features of claim 11. Therefore, claim 11 is not anticipated by *Cronch*, and the rejection should be overturned.

Since claims 12-17 and 31 depend from claim 11 and recite additional features, claims 12-17 and 31 are allowable as a matter of law over the cited art of record. Further, *Vidyanand*, *Adamske*, and *Nakamura* are legally inadequate to remedy the deficiencies of the *Cronch* reference with respect to claim 11 and claims 12-13 and 31.

In particular, *Vidyanand* describes a method for transmitting printer driver preferences across a network. In *Vidyanand*, printer preferences for use at a first printer may be transferred between client computers so that the printer preferences may be used with a second printer, where the printer preferences are modified, as needed, based on the feature set of the second printer. *See* cols. 8-9, lines 59-2. To transfer a set of printer preferences, a user can select to export the set, import a set, *etc.*, as shown by Fig. 10. As such, *Vidyanand* does not remedy the deficiencies of the *Cronch* reference with regard to independent claim 11.

For example, *Vidyanand* does not teach or suggest packaging a document file (that is to be produced as a hard copy) with a translator file in a job package that is received by the printer. For sake of argument if the printer preferences set in *Vidyanand* is construed as a translator file, *Vidyanand* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the printer preferences set in a job package that is received by the printer.

In view of the foregoing, Applicants respectfully assert that *Cronch* in view of *Vidyanand* does not teach or suggest the features of claim 16-17 which depend from independent claim 11.

Further, the proposed combination of *Cronch* in view of *Vidyanand* in further view of *Adamske* fails to teach or suggest the features of claims 12-15 which depend from independent claim 11. Accordingly, the proposed combination of *Cronch* in view of *Vidyanand* in further view of *Nakamura* fails to teach or suggest the features of claim 31 which depends from claim 16.

Therefore, the rejections of claims 12-17 and 31 should also be overturned.

D.   Applicants' Claims 18-20

As provided in independent claim 18, Applicants claim:

> A system for generating a hard copy, comprising:
> ***means for receiving a job package comprising a document file representative of a document, the document file written in a first language and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device;***
> ***means for opening the job package;***
> ***means for using the translator file to translate the document file into the second language; and***
> ***means for generating the hard copy of the document.***

(Emphasis added).

Cronch describes a method of downloading an operating system to a printer if the printer operating system does not correspond to data format of a print job to be printed at the printer. *See* abstract. As such, *Cronch* does not teach or suggest translation of a document file (that is to be produced as a hard copy) into a second language used by a hard copy generation device. Rather, *Cronch* seemingly teaches that an operating system is downloaded to a printer that understands the

native language of the document file. Therefore, translation would not seemingly be needed in *Cronch*.

Further, for sake of argument if the operating system in *Cronch* is construed as a translator file, *Cronch* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the operating system in a job package that is received by the printer.

For at least these reasons, *Cronch* does not teach or suggest "means for receiving a job package comprising a document file representative of a document, the document file written in a first language and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device; means for opening the job package; means for using the translator file to translate the document file into the second language; and means for generating the hard copy of the document," as recited in claim 18.

As a result, *Cronch* does not teach or suggest at least all of the claimed features of claim 18. Therefore, claim 18 is not anticipated by *Cronch*, and the rejection should be overturned.

Since claims 19-20 depend from claim 18 and recite additional features, claims 19-20 are allowable as a matter of law over the cited art of record. Further, *Vidyanand* and *Adamske* are legally inadequate to remedy the deficiencies of the *Cronch* reference with respect to claim 18 and claims 19-20.

In particular, *Vidyanand* describes a method for transmitting printer driver preferences across a network. In *Vidyanand*, printer preferences for use at a first

printer may be transferred between client computers so that the printer preferences may be used with a second printer, where the printer preferences are modified, as needed, based on the feature set of the second printer. *See* cols. 8-9, lines 59-2. To transfer a set of printer preferences, a user can select to export the set, import a set, *etc.*, as shown by Fig. 10. As such, *Vidyanand* does not remedy the deficiencies of the *Cronch* reference with regard to independent claim 18.

For example, *Vidyanand* does not teach or suggest packaging a document file (that is to be produced as a hard copy) with a translator file in a job package that is received by the printer. For sake of argument if the printer preferences set in *Vidyanand* is construed as a translator file, *Vidyanand* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the printer preferences set in a job package that is received by the printer.

Further, the proposed combination of *Cronch* in view of *Vidyanand* in further view of *Adamske* fails to teach or suggest the features of claims 19-20 which depend from independent claim 18.

Therefore, the rejections of claims 19-20 should also be overturned.

E. Applicants' Claims 21-23 and 32

As provided in independent claim 21, Applicants claim:

> A method for generating a hard copy, comprising:
> ***receiving an address that identifies the location of a job package that comprises a document file representative of a document, the document file written in a first language and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device;***

> ***retrieving the job package;***
> ***opening the package;***
> ***using the translator file to translate the document file
> into the second language; and***
> ***generating the hard copy of the document.***

(Emphasis added).

Cronch describes a method of downloading an operating system to a printer if the printer operating system does not correspond to data format of a print job to be printed at the printer. *See* abstract. As such, *Cronch* does not teach or suggest translation of a document file (that is to be produced as a hard copy) into a second language used by a hard copy generation device. Rather, *Cronch* seemingly teaches that an operating system is downloaded to a printer that understands the native language of the document file. Therefore, translation would not seemingly be needed in *Cronch*.

Further, for sake of argument if the operating system in *Cronch* is construed as a translator file, *Cronch* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the operating system in a job package that is received by the printer.

For at least these reasons, *Cronch* does not teach or suggest "receiving an address that identifies the location of a job package that comprises a document file representative of a document, the document file written in a first language and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device; retrieving the job package; opening the

package; using the translator file to translate the document file into the second language; and generating the hard copy of the document," as recited in claim 21.

As a result, *Cronch* does not teach or suggest at least all of the claimed features of claim 21. Therefore, claim 21 is not anticipated by *Cronch*, and the rejection should be overturned.

Since claims 22-23 and 32 depend from claim 21 and recite additional features, claims 22-23 are allowable as a matter of law over the cited art of record. Further, *Vidyanand* and *Adamske* are legally inadequate to remedy the deficiencies of the *Cronch* reference with respect to claim 21 and claims 22-23.

In particular, *Vidyanand* describes a method for transmitting printer driver preferences across a network. In *Vidyanand*, printer preferences for use at a first printer may be transferred between client computers so that the printer preferences may be used with a second printer, where the printer preferences are modified, as needed, based on the feature set of the second printer. *See* cols. 8-9, lines 59-2. To transfer a set of printer preferences, a user can select to export the set, import a set, *etc.*, as shown by Fig. 10. As such, *Vidyanand* does not remedy the deficiencies of the *Cronch* reference with regard to independent claim 21.

For example, *Vidyanand* does not teach or suggest packaging a document file (that is to be produced as a hard copy) with a translator file in a job package that is received by the printer. For sake of argument if the printer preferences set in *Vidyanand* is construed as a translator file, *Vidyanand* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the printer preferences set in a job package that is received by the printer.

In view of the foregoing, Applicants respectfully assert that *Cronch* in view of *Vidyanand* does not teach or suggest the features of claim 22 which depends from independent claim 21.

Further, the proposed combination of *Cronch* in view of *Vidyanand* in further view of *Adamske* fails to teach or suggest the features of claims 23 and 32 which depend from independent claim 21.

Therefore, the rejections of claims 22-23 and 32 should also be overturned.

F.   Applicants' Claims 24-25

As provided in independent claim 24, Applicants claim:

> A system for generating a hard copy, comprising:
> ***means for receiving an address that identifies the location of a job package that comprises a document file written in a first language and a translator file configured to translate the document file into a second language;***
> ***means for retrieving the job package;***
> ***means for opening the package;***
> ***means for using the translator file to translate the document file into the second language of specialized commands for producing a hard copy of the document file at a hard copy generation device; and***
> ***means for generating the hard copy of the document***.

(Emphasis added).

Cronch describes a method of downloading an operating system to a printer if the printer operating system does not correspond to data format of a print job to be printed at the printer. *See* abstract. As such, *Cronch* does not teach or suggest translation of a document file (that is to be produced as a hard copy) into a second language used by a hard copy generation device. Rather, *Cronch* seemingly teaches that an operating system is downloaded to a printer that understands the

native language of the document file. Therefore, translation would not seemingly be needed in *Cronch*.

Further, for sake of argument if the operating system in *Cronch* is construed as a translator file, *Cronch* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the operating system in a job package that is received by the printer.

For at least these reasons, *Cronch* does not teach or suggest "means for receiving an address that identifies the location of a job package that comprises a document file written in a first language and a translator file configured to translate the document file into a second language; means for retrieving the job package; means for opening the package; means for using the translator file to translate the document file into the second language of specialized commands for producing a hard copy of the document file at a hard copy generation device; and means for generating the hard copy of the document," as recited in claim 24.

As a result, *Cronch* does not teach or suggest at least all of the claimed features of claim 24. Therefore, claim 24 is not anticipated by *Cronch*, and the rejection should be overturned.

Since claim 25 depends from claim 24 and recites additional features, claim 25 is allowable as a matter of law over the cited art of record. Further, *Vidyanand* is legally inadequate to remedy the deficiencies of the *Cronch* reference with respect to claim 24 and claim 25.

In particular, *Vidyanand* describes a method for transmitting printer driver preferences across a network. In *Vidyanand*, printer preferences for use at a first

printer may be transferred between client computers so that the printer preferences may be used with a second printer, where the printer preferences are modified, as needed, based on the feature set of the second printer. *See* cols. 8-9, lines 59-2. To transfer a set of printer preferences, a user can select to export the set, import a set, *etc.*, as shown by Fig. 10. As such, *Vidyanand* does not remedy the deficiencies of the *Cronch* reference with regard to independent claim 24.

For example, *Vidyanand* does not teach or suggest packaging a document file (that is to be produced as a hard copy) with a translator file in a job package that is received by the printer. For sake of argument if the printer preferences set in *Vidyanand* is construed as a translator file, *Vidyanand* fails to teach or suggest that the document file (that is to be produced as a hard copy) is packaged with the printer preferences set in a job package that is received by the printer.

In view of the foregoing, Applicants respectfully assert that *Cronch* in view of *Vidyanand* does not teach or suggest the features of claim 25 which depends from independent claim 24.

Therefore, the rejection of claim 25 should also be overturned.

VIII. <u>Conclusion</u>

In summary, it is Applicants' position that Applicants' claims are patentable over the applied cited art references and that the rejection of these claims should be withdrawn. Appellant therefore respectfully requests that the Board of Appeals overturn the Examiner's rejection and allow Applicants' pending claims.

Respectfully submitted,

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<u>**Claims Appendix under 37 C.F.R. § 41.37(c)(1)(viii)**</u>

The following are the claims that are involved in this Appeal.

1.　　A method for facilitating generation of a hard copy, comprising:

selecting a document file written in a first language;

selecting a translator file configured to translate the document file into a second language of specialized commands for a hard copy generation device, the specialized commands enabling a hard copy of the document file to be produced at the hard copy generation device; and

packaging the document file and the translator file together in a job package that can be received by the hard copy generation device.

2.　　The method of claim 1, wherein selecting a document file comprises selecting a document file identified by a user.

3.　　The method of claim 1, wherein selecting a translator file comprises selecting a translator file identified by a user.

4.　　The method of claim 1, further comprising transmitting the job package to the hard copy generation device.

5.　　The method of claim 1, further comprising transmitting the job package to a recipient computing device.

6.   The method of claim 1, further comprising encrypting the job package.

7.   The method of claim 1, further comprising appending an address to the job package that identifies the location of a decryption key that can be used to decrypt the job package.

8.   A system for facilitating generation of a hard copy, comprising:

means for selecting a document file written in a first language;

means for selecting a translator file configured to translate the document file into a second language of specialized commands for a hard copy generation device, the specialized commands enabling a hard copy of the document file to be produced at the hard copy generation device; and

means for packaging the document file and the translator file together in a job package that can be received by the hard copy generation device.

9.   The system of claim 8, further comprising means for encrypting the job package.

10.   The system of claim 8, further comprising means for appending an address to the job package that identifies the location of a decryption key that can be used to decrypt the job package.

11.   A method for generating a hard copy, comprising:

receiving a job package comprising a document file representing a document, the document file written in a first language, and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device;

opening the job package;

using the translator file to translate the document file into the second language; and

generating the hard copy of the document.

12.   The method of claim 11, wherein receiving a job package comprises receiving an encrypted job package.

13.   The method of claim 12, further comprising decrypting the job package prior to opening it.

14.   The method of claim 13, further comprising retrieving a decryption key prior to decrypting the job package.

15.   The method of claim 14, wherein retrieving a decryption key comprises retrieving the key via a network using an address appended to the job package.

16.   The method of claim 11, further comprising registering with a remote computing device prior to generating the hard copy.

17.   The method of claim 16, wherein generating a hard copy is enabled by the remote computing device.

18.   A system for generating a hard copy, comprising:

means for receiving a job package comprising a document file representative of a document, the document file written in a first language and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device;

means for opening the job package;

means for using the translator file to translate the document file into the second language; and

means for generating the hard copy of the document.

19.   The system of claim 18, further comprising means for decrypting the job package prior to opening it.

20.   The system of claim 19, further comprising means for retrieving a decryption key.

21.   A method for generating a hard copy, comprising:

receiving an address that identifies the location of a job package that comprises a document file representative of a document, the document file written in a first language and a translator file configured to translate the document file into a second language of specialized commands for producing a hard copy of the document file at a hard copy generation device;

retrieving the job package;

opening the package;

using the translator file to translate the document file into the second language; and

generating the hard copy of the document.

22.   The method of claim 21, wherein retrieving the job package comprises retrieving the package from a remote location via a network.

23.   The method of claim 21, wherein receiving an address comprises receiving a one-time use address.

24. A system for generating a hard copy, comprising:

means for receiving an address that identifies the location of a job package that comprises a document file written in a first language and a translator file configured to translate the document file into a second language;

means for retrieving the job package;

means for opening the package;

means for using the translator file to translate the document file into the second language of specialized commands for producing a hard copy of the document file at a hard copy generation device; and

means for generating the hard copy of the document.

25. The system of claim 24, wherein the means for retrieving the job package comprise means for retrieving the package from a remote location via a network.

26. The method of claim 1, further comprising transmitting the job package over a network as an email attachment.

27. The method of claim 26, wherein transmitting the job package comprises transmitting the job package to a computer.

28. The method of claim 27, further comprising encrypting the job package prior to transmitting the job package to the computer.

29.   The method of claim 27, further comprising transmitting the job package from the computer to a hard copy generation device that requires the specialized commands in order to produce the hard copy.

30.   The method of claim 7, wherein appending an address comprises appending a universal resource locator (URL) that identifies the location of the decryption key.

31.   The method of claim 16, wherein registering comprises registering with a remote computing device for the purpose of determining whether a total number of hard copies have already been generated and, if so, prohibiting generation of a further hard copy.

32.   The method of claim 21, wherein receiving an address comprises receiving a universal resource locator (URL) that identifies the location of the job package.

<u>Evidence Appendix under 37 C.F.R. § 41.37(c)(1)(ix)</u>

There is no extrinsic evidence to be considered in this Appeal. Therefore, no evidence is presented in this Appendix.

Related Proceedings Appendix under 37 C.F.R. § 41.37(c)(1)(x)

There are no related proceedings to be considered in this Appeal. Therefore, no such proceedings are identified in this Appendix.